

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
The Honorable Judge Ellis

Pretrial Conference: April 9, 2021
Trial Date: April 26, 2021

REVISED DEFENSE POTENTIAL WITNESS LIST

Mr. Sanders, by and through undersigned counsel, in light of the Government's witness list (ECF No. 205) and the Fourth Circuit's recent opinion in *United States v. McCauley*, No. 19-4318, 2020 WL 7414398 (4th Cir. Dec. 18, 2020), submits a revised potential witness list:¹

1. Zackary Ellis Sanders
2. Risa Sanders
3. Jay Sanders
4. Philip dePue
5. Michael Maschke
6. Dr. Fred Berlin
7. Alleged minor victim 2
8. Alleged minor victim 3
9. Alleged minor victim 4
10. Alleged minor victim 6

¹ Mr. Sanders reserves the right to call any witness on the Government's witness list.

Respectfully submitted,

/s/

Jonathan Jeffress (#42884)
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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress